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February 26, 2010

VIA COURIER

Gail Mitchell, Deputy Director
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

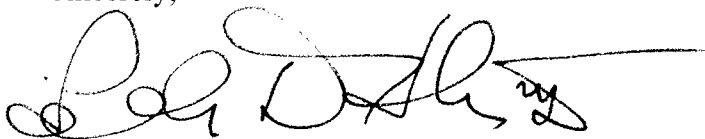
**Re: October 6, 2009, Information Request – Section 308 of the Clean
Water Act - Dalton Utilities Land Application System**

Dear Ms. Mitchell:

Enclosed with this letter is information from Dalton Utilities in response to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures are a letter dated February 24, 2010, with a certification signed pursuant to the Request and information responsive to Paragraph 9 of Enclosure A of the Request, **Monthly Report**.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,



Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL02/31578197v12



February 24, 2010

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Monthly Progress Report

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting this Monthly Progress Report to you.

Dalton Utilities submitted the Drinking Water Well Survey (Drinking Water Report), Drinking Water Well Monitoring Report, Composted Biosolids Monitoring Plan, Compost Use Review Report, and Well Construction Records on November 4, November 5, November 2, November 2, and October 23, 2009, respectively, in response to the aforementioned Information Request. Additionally, Dalton Utilities submitted revised versions of these documents on January 13, 2010, in accordance with comments from the United States Environmental Protection Agency (EPA) dated December 22, 2009.

As previously reported to you, Dalton Utilities has instituted the required quarterly sampling of the seven private drinking water wells shown to have levels of Perfluorooctanoic Acid (PFOA) or Perfluorooctane Sulfonate (PFOS) above the contract laboratory's reporting limit or level of quantification and below the published public health advisory level as well as the two additional wells found to have levels of Perfluorinated Chemicals (PFC) other than PFOA or PFOS above the contract laboratory's reporting limit or level of quantification. Dalton Utilities submitted the final analytical results of these sampling events to you on February 3, 2010. These results indicate no significant changes in the levels of PFCs detected. These locations are scheduled to be sampled again in May 2010.

As noted in previous correspondences, the private drinking water well shown to have a level of PFOS at or slightly above the published provisional health advisory level has

been connected to the nearest public water system and is no longer using the private well as a source for drinking water. As such, no additional actions are required at this location.

In accordance with the Composted Biosolids Monitoring Plan, samples were collected of the three batches of compost aged approximately 6, 12, and 18 months at the time of the August 5, 2009, correspondence to Mr. Hom in October 2009. This sampling was repeated on February 17, 2010, and is scheduled to be repeated again in June 2010, in accordance with the four month interval stipulated in the aforementioned Information Request and Monitoring Plan. The final analytical sample results will be submitted to EPA as stipulated in the aforementioned information request after receipt.

In accordance with the Compost Use Review Report, Dalton Utilities has submitted to EPA all the final analytical reports received to date for these sampling events and will submit any additional final analytical reports to EPA as required after receipt.

Dalton Utilities has completed the bench scale testing of thermal desorption of PFCs from the 6, 12, and 18 month old compost. In addition, Dalton Utilities has completed the full-scale field test which started in November 2009. To date, we have collected and submitted 40 samples to a contract laboratory for analysis. Once the final analyses are available, Dalton Utilities will report the results of the testing to EPA.

Additionally, samples of the locations stipulated in the aforementioned Information Request's Enclosure A, Paragraph 5 were collected as required for the first two quarters and submitted to a contract lab for analysis. These locations are scheduled to be sampled for the final quarterly sample in April 2010. The final analytical results of these sampling events received to date are contained in Attachments A and B which are provided herein as bound reports titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Lot # D9J230362 and D9J230348 which contains 842 and 1,862 pages, respectively.

Additionally, as noted in our correspondence to Mr. Hom dated October 20, 2009, Dalton Utilities has partnered with the Sustainability Division of the Georgia Department of Natural Resources (DNR) and the University of Georgia (UGA) to conduct a survey to evaluate the current usage and potential levels of PFCs in the industrial discharges into our wastewater collection system. The sampling was completed in early February 2010 and Dalton Utilities is awaiting the results and final report on this project.

Further, as noted in our December 23, 2009, correspondence, Dalton Utilities coordinated with the Georgia DNR and the United States Department of Agriculture Wildlife Services (USDA WS) to obtain and analyze blood and tissue samples of the wildlife on Dalton Utilities Land Application System (LAS). In accordance with this plan, the deer sampling occurred on October 2 - 3, 2009, and the turkey sampling occurred on December 16, 2009. The results for the deer serum, muscle, and liver sampling were submitted to you on December 23, 2009. The analytical results of the turkey sampling are contained in Attachments C and D which are provided herein as bound reports titled MPI

Research Report No. L0019897 and L0019898 which contains 125 and 67 pages, respectively.

Until such time that consumption guidelines are available, Dalton Utilities will not allow anyone to keep any internal organs from the wildlife obtained through the hunting operations on the Dalton Utilities LAS. The collected internal organs will be disposed of in a landfill.

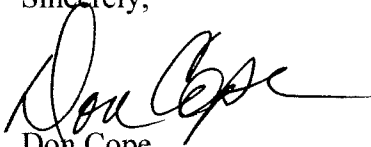
Additionally, Dalton Utilities has conducted additional sampling of the influent, untreated wastewater, and effluent, treated wastewater, from the Riverbend and Loopers wastewater treatment plants. The final analytical results of these sampling events are contained in Attachments E and F which are provided herein as bound reports titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Lot # D9K130498 and D9L080425 which contains 279 and 371 pages, respectively.

For your convenience, a summary of the samples identifications indicated in the attachments and the corresponding locations are included in Attachment G.

As always, Dalton Utilities will update you as the projects discussed with you proceed. If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Don Cope
President & CEO

Attachments (7)

- c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
Lee A. DeHihns, Esq.

Summary of Sample Identifications and Locations

<u>Attachment</u>	<u>Lot #</u>	<u>Type of Sample</u>	<u>Sample ID</u>	<u>Sample Location/Description</u>
A	D9J230362	Monitoring Well	MW 21-D2	MW 21-D2
A	D9J230362	Monitoring Well	MW 24-D1	MW 24-D1
A	D9J230362	Monitoring Well	MW 9-M3	MW 9-M3
A	D9J230362	Surface Water	R1 Browns Bridge	Browns Bridge
A	D9J230362	Surface Water	R2 Tilton Bridge	Tilton Bridge
A	D9J230362	Surface Water	R3 Fox Bridge	Fox Bridge
A	D9J230362	Surface Water	R4 Confluent	Confluent
A	D9J230362	Monitoring Well	MW 16A-M15	MW 16A-M15
B	D9J230348	Monitoring Well	MW 16-M5	MW 16-M5
B	D9J230348	Monitoring Well	MW 16B-D12	MW 16B-D12
B	D9J230348	Monitoring Well	MW 17-D11	MW 17-D11
B	D9J230348	Monitoring Well	MW 15A-M16	MW 15A-M16
B	D9J230348	Monitoring Well	MW 15-M17	MW 15-M17
B	D9J230348	Monitoring Well	MW 15B-D13	MW 15B-D13
B	D9J230348	Monitoring Well	MW 14B-D14	MW 14B-D14
B	D9J230348	Monitoring Well	MW 14-M14	MW 14-M14
B	D9J230348	Monitoring Well	MW 19A-U3	MW 19A-U3
B	D9J230348	Monitoring Well	MW 14A-D5	MW 14A-D5
B	D9J230348	Monitoring Well	MW 10-D4	MW 10-D4
B	D9J230348	Monitoring Well	MW 8-M12	MW 8-M12
B	D9J230348	Monitoring Well	MW 4-M8	MW 4-M8
B	D9J230348	Monitoring Well	MW 5-M7	MW 5-M7
B	D9J230348	Monitoring Well	MW 20-D3	MW 20-D3
B	D9J230348	Monitoring Well	MW 7A-U2	MW 7A-U2
B	D9J230348	Monitoring Well	MW 22-M1	MW 22-M1
B	D9J230348	Monitoring Well	MW 23-U1	MW 23-U1
B	D9J230348	Monitoring Well	MW 12A-D7	MW 12A-D7
B	D9J230348	Monitoring Well	MW 6-M2	MW 6-M2
B	D9J230348	Monitoring Well	MW 1-M10	MW 1-M10
B	D9J230348	Monitoring Well	MW 3-M11	MW 3-M11
B	D9J230348	Monitoring Well	MW 7-M9	MW 7-M9
B	D9J230348	Monitoring Well	MW 13A-D8	MW 13A-D8
B	D9J230348	Monitoring Well	MW 13-M13	MW 13-M13
B	D9J230348	Monitoring Well	MW 12-D6	MW 12-D6
B	D9J230348	Monitoring Well	MW 19-M4	MW 19-M4
B	D9J230348	Monitoring Well	MW 18-D9	MW 18-D9
B	D9J230348	Monitoring Well	MW 17A-M6A	MW 17A-M6A
C	L0019897	Wildlife	Turkey #2 - serum	Turkey #2 (4 yr) - serum
C	L0019897	Wildlife	Turkey #5 - serum	Turkey #5 (1 yr) - serum
D	L0019898	Wildlife	Turkey #2 - muscle	Turkey #2 (4 yr) - muscle
D	L0019898	Wildlife	Turkey #5 - muscle	Turkey #5 (1 yr) - muscle
D	L0019898	Wildlife	Turkey #5 - liver	Turkey #5 (1 yr) - liver
D	L0019898	Wildlife	Turkey #2 - liver	Turkey #2 (4 yr) - liver
E	D9K130498	Influent	I-3	Riverbend WWTP Influent
E	D9K130498	Effluent	E-3	Riverbend WWTP Effluent
E	D9K130498	Influent	I-4	Loopers WWTP Influent
E	D9K130498	Effluent	E-4	Loopers WWTP Effluent
F	D9L080425	Influent	STP3 Inf	Riverbend WWTP Influent
F	D9L080425	Effluent	STP3 Eff	Riverbend WWTP Effluent
F	D9L080425	Influent	STP4 Inf	Loopers WWTP Influent
F	D9L080425	Effluent	STP4 Eff	Loopers WWTP Effluent